

**Before the
Federal Communications Commission
Washington, DC**

In the Matter of:)	
)	
Amendment of Part 74 of the Commission's)	
Rules to Permit Satellite Feeds to)	RM-10609
Non-Commercial Educational FM Translators)	
Operating on Commercial Frequencies)	

COMMENTS OF KOL AMI HAVURAH

Kol Ami Havurah is a non-profit religious organization and broadcaster which currently holds a Construction Permit for Non-Commercial Educational LPFM station WVJW-LP located in Benwood, WV.

The Commission has before it a joint petition by Calvary Chapel of Twin Falls Inc. ("Calvary"), Creative Educational Media Corporation Inc., Priority Radio Inc., and Positive Alternative Radio Inc. ("petitioners") to amend Part 74 of the Commissions Rules to permit satellite feeds to NCE FM Translators operating in the non-reserved band. Kol Ami Havurah opposes this joint petition.

DISCUSSION

Translators are intended for Underserved or Unserved areas.

Petitioners state that their proposal would provide quality FM service to underserved and unserved areas ⁽¹⁾. However, it has been shown that many of the translators owned by the petitioners are actually in areas well served by Full Service FM broadcast stations ⁽²⁾. If a NCE broadcaster has to find a non-reserved frequency to place a translator it is obvious the area is well served by other NCE stations.

The petitioners have stated that served and unserved areas are dependant on format⁽³⁾ although the Commission has an ongoing record of not using a station's format to determine if an area is served or unserved by FM broadcasting⁽⁴⁾. By using the petitioners definition of served/unserved Kol Ami Havurah has found that of the 362 translators

¹ Petition at page 3

² REC FM comments at page 2

(which have been issued call signs) determined to be owned by Calvary Chapel of Twin Falls, 67% are located in areas served by one or more Full Service FM stations providing a Christian Religious format⁽⁵⁾. According to the petitioner's served/unserved theory, 67% of Calvary's own translators are in areas well served by Full Service FM stations. Additionally, 100% of Creative Educational Media's, 83% of Priority Radio's, and 77% of Positive Alternative Radio's translators are located in areas served by one or more Full Service FM stations providing a Christian Religious format.

Religious Broadcasters in Major Markets.

Petitioners state "In major markets religious broadcasters do not have the financial wherewithal to purchase a full power AM or FM radio station" and because of this financial limitation in major markets the petitioners should be permitted to reach these major markets via FM Translators. ⁽⁶⁾ This is farther from the truth as Exhibit 2 ⁽⁷⁾ clearly shows there are currently 369 Full Power AM & FM stations being operated by religious broadcasters in the Top 50 ADI Markets. Even in medium markets such as Wheeling, WV (ADI # 232) and markets like Shamrock TX, which are so small they are not ranked by Arbitron, have local religious broadcasters running local religious Full Power stations. Petitioners make it sound as though these Full Power stations don't exist.

Translators are not intended to create a National Broadcast Network.

The Commission's Translator Service is intended to provide FM service to areas where Full Service FM is difficult to provide an acceptable signal (IE: stations blocked by Mountains), not to provide FM service to an area that is hundreds and sometimes thousands of miles from the translator's main Full Service Station. Calvary Chapel of Twin Falls however, uses the translator service to provide a nationwide FM network ⁽⁸⁾.

The Proposal will hamper the growth of LPFM in an already congested FM Band.

Nearly all LPFM stations reside in the Non-Reserved Band. By their very nature LPFM stations are locally owned and operated, and provide a localized voice. The FM Translators owned by the petitioners retransmit the signal of FM stations usually many

³ Petitioners reply to REC FM page 2

⁴ DA-97-2069

⁵ See Exhibit 1

⁶ Petitioner reply to REC FM paragraph 1 page 3

⁷ See Exhibit 2

⁸ See Exhibit 3

hundreds of miles away thus removing the frequency from local LPFM service (9), nor do these translators provide a localized voice.

Alternative Modes of Reception are already possible instead of the use of valuable FM Bandwidth for translators.

In addition to the plethora of translators owned by Calvary Chapel of Twin Falls, their main station, KWAZ-Twin Falls, is the backbone of CSN (Calvary Satellite Network) and it's national translator network. CSN is available nationwide on Sky Angel DBS (10) channel 9762. The numbers of households currently listening to CSN on Sky Angel DBS are most likely larger than those listening to the FM translators owned by Calvary Chapel of Twin Falls. In addition all Sky Angel DBS subscribers living in an area served by one of those translators has no real need for the translator.

Distant Translator Status.

Kol Ami Havurah feels that public service would be better served if translators operated by NCE stations outside of the reserved band be given a Distant Translator Status that are subject to displacement by LPFM stations or Translator service for a local station if the translator is operated outside of the 30dBu contour of the Full Service FM parent station. Currently licensed translators would be grand fathered and not subject to displacement.

Translators Serving No Purpose.

The petitioners admit that they are using translators as "fill-in" to reach a desired location (11). However, the petitioners do not indicate, nor does it appear that they will give or are willing to give these "fill-in" frequencies back to the Commission if the petition is granted.

9 See Exhibit 3

10 Sky Angel is a Direct Broadcast Satellite service with 8 FCC licensed frequencies at the 61.5 (WL) orbital slot providing 32 video and audio channels to the Continental US with an 18 inch dish.

11 Petition at page 5

Growth of Translator Service.

Although petitioners claim they are not asking for an expansion of the translator service and that no expansion is possible with the current freeze on new translators they fail to address the possibility of fast growth in the event the current freeze is lifted. If the petition is granted translator service will quickly expand, most likely by the petitioners themselves as they will no longer be hampered by the requirement of over the air reception in the non-reserved band.

CONCLUSION

Kol Ami Havurah feels the "winners" in this proposal are not the local NCE stations, but the organizations running national networks through translators. The losers are the would be the LPFM stations and their local voice, and the local NCE broadcaster wishing to fix areas of their coverage with translators. Kol Ami Havurah requests that the Commission **DENY** this petition and not bring it to rule making.

In the event that the Commission decides to grant the proposed petition Kol Ami Havurah feels the Commission should:

- (1) Define a *Distant Translator* as "an FM Translator operating outside of the 30dBu 50/50 contour of the primary Full Service FM station for which it rebroadcasts."
- (2) Allow LPFM stations to displace Distant Translators if no other frequency is available for LPFM service.
- (3) Allow Local Full Service stations to displace Distant Translators with their own translators.
- (4) Translators used as fill-in must have their licenses returned so that those frequencies may be used for LPFM service or as translators for local stations.
- (5) Translators which are satellite fed must actually retransmit the station and not a reworked satellite network version which often omits the main station's ID.
- (6) Limit Translators for both the reserved and non-reserved bands to a limit of 10 nationally for each Full Service station.

(7) Grant waivers to the 10 translator limit if it can clearly be shown that a local community group with a sustained local presence wants a translator to bring in the distant station and will support it financially.

(8) Currently licensed translators would be grand fathered after a date specified by the Commission.

Respectively Submitted,

Rabbi Bryan K. French for

Kol Ami Havurah/WVJW-LP

489G Benwood Hill Road

Benwood, WV 26031

					EXHIBIT# 1				
Petitioners Translators and Full Service FM Stations									
already serving the area with a Christian Religious Format									
Creative Educational Media FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K202BN	KAYH	KBNV			K201DC	KGFC			
K206BB	KAYM				K201CW				
K208BV	KBVW				K201DF	KL VH	KLFF		
K209AZ	KTGS				K201DH	KLRE	KGTS		
K212DX	KLWV				K201DL	KCFN	KCWW		
K216BT	KQCV				K201DP				
K220CZ	KBOC	KGLC			K201DR	KNIS	KRNG		
K229AE	KWND	KWFC	KSCV	KADI	K201DV				
K242AA	KVRS	KJRF	KFXI		K201EB	KWPZ			
					K201EH				
Priority Radio FM Translators					K201EL	KVLW	KFLB	KKKK	
Call Sign	FM Christian Format Stations Serving Area*				K201EN	KBKS			
W211BR	WTRM				K201EQ				
W220CT	WDIH	WLOC			K201ES				
W246AQ	WSJI	WKDN			K201ET	KPWZ			
W278AK	WKDN				K201EX	KCMS			
W292CF					K201EY	KSPL	KALS		
					K201FD				
Positive Alternative Radio FM Translators					K201FF				
Call Sign	FM Christian Format Stations Serving Area*				K201FH	KWPZ			
W201CU					K201FJ				
W209BQ	WPIM				K201FK				
W216BI	WTJY	WHPE			K201FL	WBMV	WAPO		
W217AX	WRCM				K201FN				
W218BZ	WPVA				K201FO	KYLC	KOJO	KAJN	
W220CU	WRVL	WOKD	WKVE		K201FP	KAYM			
W273AA					K201FQ	KHJC	KAWW		
W279AC	WRVL	WRXT	WPAR		K201FT	KAFO			
W280DB	WRVL	WRXT	WWMC	WTTX	K201FW				
* signal level at 60dBu (50,50)									

Calvary Chapel of Twin Falls FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K201EX	KHCP				K204DN	KAOG			
K201GA	KWTN				K204DO	KANX			
K201HB					K204DQ	KYFW	KZZD	KCFN	KBBD
K202CC					(CONT.)	KCVW	KTLI		
K202DN	KSJY	KAJN	KFXZ		K204DT	KWND	KSCV		
K202DP					K204DV	KTSY	KARO	KXBL	
K202DS	KWPZ				K204DX	KPAC	KYFS	KZLV	
K202DT					K204DY	KSGN	KLRD	KFSB	KWVE
K202DU	KLVM				K204EH	KUFR	KYFO		
K203BT	KQFE	KLWJ	KHPE		K204EM	KSGN	KLRD	KFSB	
K203BU	KLVG				K204EP				
K203CQ					K204EQ	KJOV			
K203CU	KIBC	KVIP			K204ES	KTIG			
K203CW					K204EU				
K203DB					K204EV	KMZL			
K203DD					K205CK	KLFV			
K203DI	KKRI	KARG	KZKZ		K205CS	KJTY			
K203DP					K205CT	KPOR	KNGM		
K203DS					K205DD	KCMS			
K203DT					K205DF	KCMS			
K203DV	KHJC	KAWV			K205DH				
K203DX					K205DL	KCMS			
K203DZ					K205DM	KLOV			
K203EB	KNMI	KTGW	KPCL		K205DO	KWPZ			
K203ED	KWIM				K205EA				
K204CN	KLFC	KWFC			K205EB				
K204CX	KMZO				K205ED				
K204CZ	KOLU	KBLD	KGSC	KGDN	K205EG				
K204DH	KAYB	KSOH	KYPL		K205EJ				
K204DJ	KLVC	KHAP	KYIX		K205EK				
K204DK	KLVC	KHAP	KYIX		K205EN				
K204DM					K205EQ				
* signal level at 60dBu (50,50)									

Calvary Chapel of Twin Falls FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K206BW	KDFR	KZZQ			K209CY				
K206CF	KNLE				K209DC				
K206CH	KVCY				K209DI	KXOO			
K206CI					K209DJ	KMSI			
K206CL	KZNZ				K209DS				
K206CU	KWPZ				K209EH				
K206CX					K209EN	KDFR			
K206CY					K209ES	KNLR			
K206DC	KLWW	KBMM	KFLB	KKKK	K209EU				
K206DF	KPRA				K210BZ	KPHF	KFLR	KLVA	
K206DG					K210CM				
K206DJ	KBUG				K210CN	KWPZ			
K207BT	KOBC	KNEO			K210CP	KPHF	KBIE	KFLR	KLVA
K207CE	KLVB	KVIP			K210DL	KHMS	KXRD	KELT	
K207CH					K210DM	KYTT			
K207CP	KINS				K211DC	KILA			
K207CS	KPLW				K211DD	KCFY			
K207CT	KIBC	KVIP			K211DG	KCFS	KNWC		
K207CW	KOLX				K211DQ	KHJC	KAWV		
K207DJ					K211DS	KHCP			
K207DN	KEAR				K211DT	KPNO			
K207DO	KRLF				K211DU				
K207DQ					K211DV	KPHF	KGCB		
K207DS	KKRI	KZKZ			K211EA				
K208CG	KMSI	KYLV	KOKF		K211EB	KNIS	KRNG		
K208DH	KJRT	KXLV	KAWV	KXRI	K211EI				
(cont.)	KRGN	KAEZ			K211EL				
K208DO	KNDL	KEAR			K211EM	KAZC	KAYC	KWRD	
K208DS	KTFG				K211EN	KMBN			
K208EH	KHKV				K211EP				
K208EK					K211EU				
K208EM					K212AK	KLVU	KHPE		
* signal level at 60dBu (50,50)									

Creative Educational Media FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K212BD					K215DG	KLVC	KHAP		
K212DB	KMLW	KTHC			K215DV	KLMP	KSLT		
K212DE	KZML				K215DX				
K212DF	KLVB	KVIP			K215EC				
K212DG	KJRT	KXLV	KXRI	KRGN	KAEZ	K215EE	KAYH	KBNV	
K212DK	KNDL	KLVR			K216AX	KRSI			
K212DQ					K216CO	KRQZ			
K212DR	KCIR				K216CX	KLRD			
K212DV	KALS				K216DF				
K212EJ	KCMI				K216DG				
K212EK	KHMS	KXRD	KELT		K216DJ	KILA			
K212EO	KXCR	KPAS			K216DZ	KLRD	KFSB		
K212EW	KWFL				K216EC				
K212EY	KMBI				K216EG	KJVH	KZOE		
K213AR	KRQZ				K216EO	KXOO			
K213CF	KAPK				K216ET	KPDQ	KFIS		
K213CQ	KUFR	KYFO			K216EW				
K213CY	KLVC	KHAP	KYIX		K216FH	KILA			
K213DB					K216FI	KAIM			
K213DC					K216FQ	KRQZ			
K213DT	KHKV				K216FR	KAYM			
K213DY					K217CN	KBMH			
K214CT	KEFR	KLVB	KCIV	KAMB	K217DG				
K214DM	KLVC	KHAP	KYIX		K217DN				
K214DP					K217DR				
K214DX					K217EA				
K214DZ	KAIM				K217EL	KLVB			
K215CA	KGBM				K217EM				
K215CG	KVCM				K217EQ	KLVB			
K215CS					K218CE				
K215CW					K218CF	KYFS			
K215CX					K218CI	KIBC	KVIP	KLVB	
* signal level at 60dBu (50,50)									

Creative Educational Media FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K218CP	KDAR				K221DV	KACS			
K218CX	KSOH	KYPL			K225AJ	KVIP			
K218DE	KAOG	KJLV			K229AF	KLVJ			
K218DF	KCSH				K231AM	KPDQ	KFIS		
K218DN	KCMM				K235AG				
K218DP					K238AC				
K219DW	KPNO				K240AK	KFRS			
K219KL	KMSI				K240CD	KFER	KSRI		
K219KP	KWPZ				K244AY	KIBC	KVIP	KLVB	
K220EU	WPAE	KPAE			K244DE	KLVH	KLFF		
K220FT					K249AQ	KLVK			
K220FW					K249BS	KAPK			
K220FX					K252CK	KLVM			
K220FY					K252DL	KHPE			
K220GI	KJTA	KGCB			K254AP				
K220GL	KZLV				K256AI				
K220GO	KPHF	KFLR	KLVA		K258AP	KSPL	KALS		
K220GZ	KGCB				K259AK	KNIS			
K220HA					K261CP				
K220HD	KCMS				K262AK				
K220HE	KACS				K263AH	KGCB			
K220HH	KPHF	KBIE	KFLR	KLVA	K266AH	KFRB			
K220HI					K266AI	KNLR			
K220HM					K267AE	KARO			
K220HT	WCBW	KSIV			K268AL	KLOV			
K220HU					K268AM				
K220HX					K268AQ	KAYH	KBNV		
K220IA	KLVG				K272AY				
K220IB					K272CH	KLVG			
K220IC	KCMS				K272DV	KARO			
K220IJ					K272DW	KLVP	KPFR	KPDQ	KFIS
K220IL					K273AI	KJVH	KPDQ		
* signal level at 60dBu (50,50)									

Creative Educational Media FM Translators					Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*				Call Sign	FM Christian Format Stations Serving Area*			
K280BK					W206AT	WLXP	WYFS	WLFS	
K285EW	KL VH	KLFF			W206AY	WSCL	WOLC		
K288BO	KL VH	KLFF			W207BA	WEFR	WCTL		
K288DR	KHCS				W207BQ	WMHK			
K292EX	KNIS	KRNG			W208BA	WKVC			
K294AE	KTSY	KARO	KXBL		W208BB	WMUZ			
K296BS	KDOV				W209BJ	WMSL	WRAF	WFSH	
W201BE	WFBF	WDCX			W209BM	WORQ	WEMY	WVRM	
W201BN					W211AY	WWIB			
W201CC	WYFW	WWEV	WFSH		W213BD	WLFJ	WTBI	WMIT	
W201CF	WOLW				W213BE	WFSH			
W201CH	WFCH	WYFH	WKCL	WJNI	W213BI	WNLD			
W202BA	WBKG	WPWB	WJTG	WQIL	W214AR	WVOA			
W203AX					W214BE	WGNB	WAYG	WCSG	WJQK
W203AY	WAYF	WRMB	WCNO		(cont.)	WFUR			
W203BA					W214BN	WPCS	WBHY		
W203BB					W215AV	WOHP	WOKE		
W203BG	WKVC	WSTS			W215BE	WAOY	WOSM		
W203BH	WBKG	WPWB			W215BF	WORQ			
W203BJ	WJTF				W215BO				
W203BK	WMSL	WFSH			W216BM	WJIE	WFPK	WRVI	
W204BH	WRVL	WRXT	WPAR		W216BQ	WAFT			
W204BK	WORQ	WEMI			W216BX				
W204BN	WYFW	WWEV	WFSH		W217AQ	WMBU	WQST		
W204BP	WVCF	WHEM	WWIB		W217AZ	WNCM	WJIR	WECC	WYFB
W204BW	WPCS	WTGF	WEGS	WGCX	(cont.)	WNLE	WBGB		
W205AT	WBCY				W217BA	WJCR			
W205BJ	WFCH	WYFH	WJNI		W217BC	WJYS			
W205BP					W217BI	WAKW	WFCJ	WNLT	
W205BY	WTJY	WHPE			W218BX	WAGP	WYFS		
W206AI	WMBI	WZFS			W218BY				
W206AR	WLPG				W219CN	WBYX			
* signal level at 60dBu (50,50)									

Calvary Chapel of Twin Falls FM Translators				
Call Sign	FM Christian Format Stations Serving Area*			
W219CX	WAUQ	WYFJ		
W220BT				
W220CC	WAYW	WVRV		
W220CD	WLFA	WMIT		
W220CS	WAGP			
W220DF	WJIR			
W220DH	WECC	WAYR		
W229AE	WRVL	WRXT	WWMC	WTTX
W243AL	WHPE	WKVE		
W264AK	WYSZ	WPOS		
W273AH	WATU	WQST	WHST	
W289AJ	WRVL	WOKD	WKVE	
W290AK	WPIM			
W291AN	WPIM	WOKD	WKVE	
* signal level at 60dBu (50,50)				

		EXHIBIT# 2					
Christian Religious Formatted Full Service FM Stations in Markets 1-50							
City/Market/Rank	Band	Stations					
New York City ADI# 1	FM	WFME	WAWZ				
	AM	WMCA	WWDJ				
Los Angeles, CA ADI# 2	FM	KFSG	KFSH	KKLA	KWVE		
	AM	KBRT	KALI	KFRN	KLTX	KTYM	
Chicago, IL ADI# 3	FM	WETN*	WCLR*	WONU*	WMBI*	WJCH*	WJKL
	FM	WYCA	WZFS				
	AM	WAUR	WMBI	WYLL	WGCI	WWHN	
San Francisco, CA ADI# 4	FM	KFSB	KEAR				
	AM	KFAX	KDYA	KSFB			
Dallas/Ft. Worth, TX ADI# 5	FM	KJCR*	KTPW*	KCBI*	KDKR*	KVTT*	KLTY
	FM	KWRD					
	AM	KSKY	KHVN	KGGR	KZEE	KTNO	KNAX
Boston, MA ADI# 6	FM						
	AM	WEZE	WROL				
Houston, TX ADI# 7	FM	KFTG*/KJIC*		KAXF*	KSBJ*	KHCB	
	AM	KYND	KGBC	KILE			
	AM	KKHT	KTEK	KYOK	KWWJ	KLVL	KANI
Washington, DC ADI# 8	FM	WGTS*	WAVA	WFSI			
	AM	WABS	WCTN	WFAX	WYCB	WKDV	WPGC
Philadelphia, PA ADI# 9	FM	WSJI*	WKDN				WISP(AM)
	AM	WFIL	WVCH	WTMR	WZZD	WNAP	WDAS
Detroit ADI# 10	FM	WMUZ					WLQV(AM)
	AM	WLLZ	WUFL	WCAR	WCHB	WEXL	WMKM
Atlanta, GA ADI# 11	FM	WWEV*	WVFJ*	WPZE	WFSH		
	AM	WAEC	WAFS	WNIV	WGUN	WPBS	WWWE
	AM	WTJH	WGKA	WLTA	WYZE	WDCY	WSSA
Miami, FL ADI# 12	FM	WIRP*	WMCU*	WAFG*	WMKL*		
	AM	WACC	WJNA	WMBM	WEXY	WJCC	
Puerto Rico ADI# 13	FM	NOTE: Market includes the entire territory of Puerto Rico					
	AM	For the purpose of this report this market was omitted					
Seattle, WA ADI# 14	FM	KWFJ*	KCMS				
	AM	KCIS	KGNN	KBLE	KARR	KZIZ	KLFE
Phoenix, AZ ADI# 15	FM	KPHF*	KBIE*	KFLR*	KLVA		
	AM	KCKY	KXEG	KPXQ	KASA		
Minneapolis-St.Paul, MN ADI# 16	FM	KNOF	WLKX/KBGY	KTIS			
	AM	WMIN	KTIS	WCTS	KSMM	KMMS/KYCR	
San Diego, CA ADI# 17	FM						
	AM	KECR	KPRZ				
Long Island(A) ADI# 18	FM	WFRS*		(A)-Long Island Market is an overlay market			
	AM	WNYG	WFTU	and inside the New York City market			
St. Louis, MO ADI# 19	FM	WCBW*	KGNA*	KSIV*	WDID(AM)	KATZ(AM)	KIRL(AM)
	AM	KJSL	KFUO	WCBW	KXEN	WRYT	KSIV
Baltimore, MD ADI# 20	FM	WRBS	WFSI				
	AM	WCAO	WBMD	WBGR	WITH	WWIN	WJRO
Denver, CO ADI# 21	FM	KLDV*	KJMN*	KRKS	KXPK		KBJD(AM)
	AM	KLTT	KLDC	KRKS	KXMA	KLVS	KPOF

Tampa, FL ADI# 22	FM	WYFE*	WBVM*	WKES*	WFTI*		
	AM	WTBN	WTWD	WTIS	WBRD		
Pittsburgh, PA ADI# 23	FM	WRWJ*	WORD				
	AM	WPIT	WAVL	WWNL	WGBN	WPGR	WKTW
Portland, OR ADI# 24	FM	KBVM*	KLVP*	KPFR*	KPDQ	KFIS	
	AM	KLVP	KKSL	KKPZ			
Cleveland, OH ADI# 25	FM	WFHM	WCRF				
	AM	WCCD	WJTB	WHK	WJMO	WABQ	
Cincinnati, OH ADI# 26	FM	WJYC*	WAKW	WNLT	WIOK		
	AM	WNOP	WTSJ	WCVG	WCNW		
Sacramento, CA ADI# 27	FM	KEDR*/KEBR*	KKFS				
	AM	KFIA	KJAY	KSMH			
Riverside, CA ADI# 28	FM	KSGN*	Note: Market is also inside Los Angeles Market				
	AM	KEYZ	KSDT	KPRO			
Kansas City, MO/KS ADI# 29	FM	KLJC*	KCCV/KAYK				KPRT(AM)
	AM	KCCV	KGGN	KCWJ	KEXS	KKLO	KLEX
San Antonio, TX ADI# 30	FM	KYFS*	KZLV*				
	AM	KSLR	KDRY	KCHL	KBRN		
San Jose, CA(B) ADI# 31	FM	KEAR-San Francisco		(B)-San Jose Market is an overlay market inside the San Francisco Mkt.			
	AM	KFAX & KFSB San Francisco					
Salt Lake City, UT ADI# 32	FM	KFUR*	KYFO				
	AM	KANN	KEYY	KYFO	KLLB	KMRI	
Milwaukee, WI ADI# 33	FM	WMWK*	WFZH	WVCY			
	AM	WRRD	WEMP	WJYI	WGLB		
Providence, RI ADI# 34	FM						
	AM	WARV	WRIB				
Columbus, OH ADI# 35	FM	WUFM*	WCVO	WJYD			
	AM	WRFD	WVKO				
Middlesex, NJ(C) ADI# 36	FM	(C)-Middlesex is an overlay market inside the New York City Market					
	AM	Served by New York City Stations WFME, WAWZ, etc...					
Charlotte, NC ADI# 37	FM	WRCM*	WYFQ	WABZ	WAGI	WYFQ(AM)	WBZK(AM)
	AM	WGSP	WGAS	WDEX	WRKB	WOGF	WGIV
	AM	WAVO/WHVN/WCGC	WRNA/WRKB		WLTC/WGCD		
Norfolk-Tidewater, VA ADI# 38	FM	WODC*	WAZP*	WYCS*	WXEZ	WYFI	
	AM	WKGM	WPMH	WCKO	WTJZ	WGPL	WCPK
Orlando, FL ADI# 39	FM	WPOZ*	WLAZ*				
	AM	WTLN	WRLZ	WHIM	WOKB		
Indianapolis, IN ADI# 40	FM	WGNR	WXIR				
	AM	WTLC	WBRI	WNTS			
Las Vegas, NV ADI# 41	FM	KILA*					
	AM	KKVV					
Austin, TX ADI# 42	FM	KNLE*					
	AM	KIXL	KFIT				
Winston-Salem, NC ADI# 43	FM	WBFJ*	WXRI*	WHPE	WKVE		
	AM	WTNC	WTRU	WPIP	WPET	WKTE	WCLW
	AM	WSMX	WEAL	WBFJ	WOKX	WPOL/WKEW	
New Orleans, LA ADI# 44	FM	WBSN*	WXXF/WXXM			WBOK(AM)	KAGY(AM)
	AM	WVOG	KKNO	WSHO	WYLD	WCKW	WLNO
Nashville, TN	FM	WFSK*	WAYM*	WNAZ*/WNRZ*	WCFM*	WJOI	
	FM	WYYB/WRLG		WVRY/WBOZ		WENO(AM)	WMDB(AM)

ADI# 45	AM	WYFN	WQSE	WYXE	WNSG	WNQM	WNAH
Raleigh-Durham, NC	FM	WYFL	WNNL	Also served by WKVE-Winston-Salem			
	AM	WHPY	WRTG/WRTP				
ADI# 46	AM	WAUG	WPJL	WTIK	WSRC	WCRY	WCLY
Memphis, TN	FM	KKLV/WKVF	WVIM	WOTO			WMQM(AM)
ADI# 47	AM	WCRV	KWAM	WAVN	WLOK	WLRM	WBBP
West Palm Beach, FL	FM	WAYF*	WRMB*	WMCU*	WCNO*		
ADI# 48	AM	WJNA					
Hartford, CT	FM	WIHS					
ADI# 49	AM	WCTF					
Buffalo, NY	FM	WFBF*	WDCX				
ADI# 50	AM	WUFO	WMNY				
* Indicates NCE FM Station operating in the reserved band							
/ Simulcast Stations (counted as 1 station)							

EXHIBIT# 3

Calvary Chapel of Twin Falls

- Full Power Stations
- Translators (Licensed/CPs w/ call signs)

